

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

FOLLOW-UP INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS FRANK NERI
(APWU/USPS-T4-31-32)
(March 13, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following follow-up interrogatories to United States Postal Service witness Frank Neri (USPS-T-16). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T4-31 Please refer to your response to APWU/USPS-T5-6(c) redirected to you from Witness Bratta, where you state in part, “[e]xcess equipment or equipment deployed to other facilities is individually justified outside of the AMP analysis.”

- a) Does this mean that the costs attributed to excess equipment that must be stored is not considered in the AMP study?
- b) Please also provide an example of how this equipment is “justified outside of the AMP analysis?”

APWU/USPS-T4-32 Please refer to your response to APWU/USPS-T5-6(d) redirected to you from Witness Bratta. Please explain why the lost value of excess equipment that is stored, disposed of, or sold for less than its value not accounted for in the AMP study or PIR.